

Department of Energy Yucca Mountain Site Characterization Project Office P. O. Box 98608 Las Vegas, NV 89193-8608

WBS 1.2.9.3 QA

MAY 08 1991

Robert F. Pritchett Technical Project Officer for Yucca Mountain Site Characterization Project Reynolds Electrical & Engineering Co., Inc. P.O. Box 98521 Las Vegas, NV 89193-8521

EVALUATION OF AMENDED RESPONSES TO CORRECTIVE ACTION REQUESTS (CARS) YM-91-026, YM-91-037, AND YM-91-038 RESULTING FROM YUCCA MOUNTAIN QUALITY ASSURANCE DIVISION (YMQAD) AUDIT YMP 91-02 OF REYNOLDS ELECTRICAL & ENGINEERING CO., INC.

The YMQAD staff has evaluated the amended responses to CARS YM-91-026, YM-91-037, and YM-91-038. The responses have been determined to be satisfactory. Verification of completion of the corrective actions will be performed after the effective dates provided. Any extension to these dates must be requested in writing with appropriate justification prior to the date. Please send a copy of extension requests to Nita J. Brogan, Science Applications International Corporation, Las Vegas, Nevada.

If you have any questions, please contact either Catherine E. Hampton at 794-7973 or Mario R. Diaz at 794-7974.

Donald G. Horton, Director Yucca Mountain Quality Assurance Division

YMOAD: CEH-3534

Enclosure: CARs YM-91-026, YM-91-037, and YM-91-038

cc w/encl: K. R. Hooks, NRC, Washington, DC S. W. Zimmerman, NWPO, Carson City, NV W. J. Glasser, REECo, Las Vegas, NV N. J. Brogan, SAIC, Las Vegas, NV, 517/T-08

cc w/o encl: J. W. Gilray, NRC, Las Vegas, NV

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FULL TEXT ASCII SCAN add: K.R. Hooks

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	CORRECTIV	E ACTION REQUE	ST		
1 Controlling Document QP 2.4		<u></u>		ed Report No. r NO. 91-02	
3 Responsible Organization		4 Discussed With			
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10 Response Due 30 Days After Issue	11 Responsibility for C R. F. Pritchett			Stop Work Order No	Y or N
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ENCLOSURE

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7 Recommended Action(s) (con measures required to corre planned corrective action	ntinued)		nd the

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	OFFICE OF CIVILIAN RADIOACTIVE WASTE MANAGEMENT U.S. DEPARTMENT OF ENERGY WASHINGTON, D.C.
	CORRECTIVE ACTION REQUEST (continuation sheet)
	CORRECTIVE ACTION RESPONSE: CAR YM-91-026
	1. CORRECTIVE ACTION FOR DEFICIENT CONDITION # <u>ALL</u>
	A. <u>Extent of Deficiency:</u>
	It is acknowledged that the deficiency exists with all Personnel Qualification Evaluation, Indoctrination, Training and Proficiency Evaluation records.
	B. <u>Root Cause:</u>
	It was not clearly understood that the provisions of the Privacy Act of 1974 had been changed to allow training records to be processed by the Local Records Center (LRC).
	C. <u>Remedial Actions:</u> (All Actions To Be Completed By 10-27-91)
	A recent evaluation by REECo has clarified the acceptability of submitting the training records to the LRC. All training records will be processed in accordance with the provisions of the Privacy Act, DOE-80, Quality Assurance Training and Qualification Records. This will be the final action to be taken in our updating of training records.
ŀ	D. <u>Corrective Action to Prevent Recurrence:</u>
	Everyone involved with processing training records to the LRC has been given written guidance by the Logistical Support Department Manager as to the contents of the provision of Privacy Act, DOE-80. All new personnel will be given the same guidance. This response was arrended on AP 23, 91 4 4/24/91
	Response Approved: <u>Bruce Hordelly For R.F.P.</u> <u>4/12/91</u> Responsible Manager Date
	RESPONSE ACCEPTED:
	RESPONSE ACCEPTED: Date Date

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CAR NO.	YM-91-026
	04-22-91
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CORRECTIVE ACTION REQUEST (continuation sheet)

AMENDED RESPONSE

CORRECTIVE ACTION RESPONSE: CAR YM-91-026

1. CORRECTIVE ACTION FOR DEFICIENT CONDITION # <u>ALL</u>

A. <u>Extent of Deficiency:</u>

It is acknowledged that the deficiency exists with all Personnel Qualification Evaluation, Indoctrination, Training and Proficiency Evaluation records.

B. <u>Root Cause:</u>

It was not clearly understood that the provisions of the Privacy Act of 1974 had been changed to allow training records to be processed by the Local Records Center (LRC).

C. <u>Remedial Actions:</u> (All Actions To Be Completed By 10-27-91)

A recent evaluation by REECo has clarified the acceptability of submitting the training records to the LRC. All training records will be processed in accordance with the provisions of the Privacy Act, DOE-80, Quality Assurance Training and Qualification Records. This will be the final action to be taken in our updating of training records as follows:

- 1. The intermediate steps will include having all records updated and provided to the training administrator by July 12, 1991.
- 2. The verification process will be accomplished, and the records of those individuals performing quality affecting activities will be forwarded to the LRC by July 26, 1991.
- 3. The records of those not currently performing quality affecting activities will be verified and transmitted to the LRC by October 27, 1991.

Str dtd 4/23/91- 580-01-377

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CORRECTIVE ACTION REQUEST (continuation sheet)

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D. <u>Corrective Action to Prevent Recurrence:</u>

Everyone involved with processing training records to the LRC has been given written guidance by the Logistical Support Department Manager as to the contents of the provision of Privacy Act, DOE-80. All new personnel will be given the same guidance.

Response Approved:	Responsible Manager	<u>4/23/9/</u> Date
RESPONSE ACCEPTED:		<u>4/24/91</u> Date
RESPONSE ACCEPTED:	Catherine Flamptage	<u>4-210-91</u> Date

30 Days After Issue P. F. Pritchett No 5 Requirement: QP 17.0, Rev. 4, Paras. 5.4 and 5.4.5 state, "Each organization generating records is responsible for the control, authentication and distribution of its own records, including transmitting the original, or best available copy to the LRC for processing." Para. 6.1.1 states in part, "As a minimum, QA records shall include documents which specify, verify, or affect quality, i.e., results or reviews, audits monitoring of work performance and closely related documents such as qualifications of personnel, procedures." IM-LRC-IP-01, Rev. 0, Para. 6.1.4.2 states in part, "Each Record Package shall contain a Table of Contents and be listed on the Records Administrator Submittal Form. Upon completion of Submittal Form, the completed record package, along with the Submittal Form and the Table of Contents, shall be transmitted to the LRC within 10 working days after the closeout of the 6 Adverse Condition: Contrary to the above requirements, QA Record Packages for procedures, cannot be found within the QI Record System, or have not been transmitted to the LRC in a timely manner. Examples of this are as follows: 1. No documented evidence was found that the QA, IF, QS, Calibration and Welding procedures were received by the LRC as QA Record Packages. NOTE: REFerence Updated Responses to AFR-5, dated 02/20/91. 2. The Management Assessment for 1990 and the Readiness Review for Midway Valley activities 7 Recommended Action(s): Identify the remedial action(s) to be taken to correct the deficiencies noted in Block 6. Investigate the program process, activities or documentation to determine	<u> </u>)	<i>ز</i>		RIGINAL BARED STAMP
1 Controlling Document 2 Related Report No. AUDIT NO. 91-02 3 Responsible Organization REECo 4 Discussed With C. Thompson, R. Pritchett, M. Fox 10 Response Due 30 Days After Issue 11 Responsibility for Corrective Action No 12 Stop Work Order Y or I No 7 Requirement: 0 P. F. Pritchett 12 Stop Work Order Y or I No 7 Requirement: 0 P. F. Pritchett No 8 responsible for the control, authentication and distribution of its own records, including transmitting the original, or best available copy to the LRC for processing." Para: 6.1.1 states in part, "As a minimum, QA records shall include documents which specify, werity, or affect quality, i.e., results or reviews, audits monitoring of work performance and closely related documents such as qualifications of personnel, procedures." PH-BC-TPOI, Rev, O, Para: 6.1.4.2 states in part, "Sach Hescord Package, shall contain a Table of Contents and be listed on the Records Administrator Submittal Form and the Table of Contents, shall be transmitted to the LRC within 10 working days after the closeout of the 6 Adverse Condition: Contrary to the above requirements, QA Record Packages for procedures and their revisions, plu: QA Record Packages described in REECo QA Implementing Procedures, cannot be found within the Q Records System, or have not been transmitted to the LRC within 10 working days after the closeout of the 6 Adverse Condition: 1. No documented evidence was found that the QA, IP, QS, Calibration and Welding procedures were received by the LRC as QA Record Packages.		RADIOACTIVE V U.S. DEPAR	WASTE MANAGEI	MENT SI	ATE: 03/07/91 HEET: 1 OF 2 QA
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REECO C. Thompson, R. Pritchett, M. Fox 10 Response Due 11 Responsibility for Corrective Action 12 Stop Work Order Y or I 30 Days After Issue P. F. Pritchett No 15 Requirement: \$\Phi 17.0, Rev. 4, Paras. 5.4 and 5.4.5 state, "Each organisation generating records is responsible for the control, authentication and distribution of its own records, including transmitting the original, or best available copy to the LRC for processing." Para. 6.1.1 states in part, "As a minimum, QA records shall include documents which specify, verify, or affect quality, i.e., results or reviews, audits monitoring of work performance and closely related documents such as qualifications of personnel, procedures." IM-LRC-IP-01, Rev. 0, Para. 6.1.4 2 states in part, "Each Record Package shall contain a Table of Contents and histed or the Records Saminfittators Subtral Form. Upon completion of Submittal Form bac completion of Submittal Form and the Table of Contents, shall be transmitted to the LRC within 10 working days affect the closeout of the 6 Adverse Condition: Contrary to the above requirements, QA Record Packages for procedures, cannot be found within the QI Record Packages described in REECo QA Implementing Procedures, cannot be found within the QI Record Packages do Record Packages and Record Packages. NOTE: REECo Internal Audit No. REECo-001-90, AFR-5, previously reported that the Physical Standards Laboratory and Weld Laboratory records have not been transmitted to the LRC in a timely walley activities 7 Record Saminess Review for Midway Valley activities 7 <td>•</td> <td>· · · · · · · · · · · · · · · · · · ·</td> <td></td> <td></td> <td></td>	•	· · · · · · · · · · · · · · · · · · ·			
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 QP 17.0, Rev. 4. Paras. 5.4 and 5.4.5 state. "Each organization generating records is responsible for the control, authentication and distribution of its own records. including transmitting the original, or best available copy to the LNC for processing." Para. 6.1.1 states in part, "As a minimum, OA records shall include documents which specify, verify, or affect quality, i.e., results on reviews, sudits monitoring of work performance and closely related documents such as qualifications of personnel, procedures." TH-LNC-TP-O1, Rev. 0. Para. 6.1.4.2 states in part, "Each Record Package shall contain a Table of Contents, shall be transmitted to the LNC within 10 working days after the closeout of the Contrary, shall be transmitted to the LNC within 10 working days after the closeout of the 6 Adverse Condition: Contrary to the above requirements, OA Record Packages for procedures and their revisions, plum (A Record Packages described in REECO A). THE procedures, cannot be four within the QA records System, or have not been transmitted to the LNC in a timely manner. Examples of this are as follows: No documented evidence was found that the QA, IP, QS, Calibration and Welding procedures were received by the LNC as QA Record Packages. NOTE: REECO Internal Audit No. REECO-010-90, ARR-5, previously reported that the Physical Standards Laboratory records have not been transmitted to the LNC. Reference Updated Responses to ARR-5, dated 02/20/91. The Management Assessment for 1990 and the Readiness Review for Midway Valley activities The Management Assessment for 1990 and the Readiness Review for Midway Valley activities The Management Assessment for 1990 and the Readiness Review for Midway Valley activities The Management Assessment for LQE 30. Yelfy the remedial action(s) to be taken to correct the deficiencies noted in Block 6. Investigate the program process, activities or documentation to		1		· · ·	Work Order Y or N
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Identify the remedial action(s) to be taken to correct the deficiencies noted in Block 6. Investigate the program process, activities or documentation to determine the extent and depth of similar deficient conditions on the CAR. Identify these deficiencies and provide the 8 Initiator Date: 9 Severity Level- M. R plaz 202/28/91 1 2 2 3 1 0 00A J. Rlayford By: Date 15 Verification of Corrective Action:	are as follows: 1. No documented evider were received by the NOTE: REECo Interna Standards Lak LRC. Referen	nce was found that the LRC as QA Record Pa al Audit No. REECo-00 poratory and Weld Lah nce Updated Responses	ne QA, IP, QS, Calibra ackages. D1-90, AFR-5, previous poratory records have s to AFR-5, dated 02/2	ation and Weld sly reported t not been tran 20/91.	ing procedures that the Physical nsmitted to the
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OFFICE OF CIVILIAN
RADIOACTIVE WASTE MANAGEMENT
U.S. DEPARTMENT OF ENERGY
WASHINGTON, D.C.

CAR NO .:	YM-91-03	77
DATE:	03/07/91	
SHEET: _	2 OF	2

CORRECTIVE ACTION REQUEST (continuation sheet)

5 Requirements (continued) record package."

6 Adverse Condition (continued)

have not been transmitted as a QA record package.

- 3. Audit REECo-004-90, report was issued on May 29, 1990 and the last finding was closed on July 7, 1990. However, it was transmitted to the LRC on November 7, 1990.
- Audit REECo-005-90, report was issued on June 6, 1990 and the last finding was closed on June 26, 1990. However, it was transmitted to the LRC on November 7, 1990.

7 Recommended Action(s) (continued)

measures required to correct them. Identify the cause of the condition and the planned corrective action to prevent recurrence.

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OFFICE OF CIVILIAN RADIOACTIVE WASTE MANAGEMENT U.S. DEPARTMENT OF ENERGY WASHINGTON, D.C.

CAR NO.	Y٢	-91-	037	
DATE:	04	-12-	91	
SHEET.	1	_OF _	2	

CORRECTIVE ACTION REQUEST (continuation sheet)

CORRECTIVE ACTION RESPONSE: CAR YM-91-037

1. CORRECTIVE ACTION FOR DEFICIENT CONDITION # ALL_

A. Extent of Deficiency:

- A sample review of record packages was performed and determined that many record packages may be missing from the Local Record Center (LRC).
- For those record packages currently in the LRC, many were not submitted in accordance with the 10-day turnover requirement.

B. <u>Root Cause:</u>

- C. <u>Remedial Actions:</u> (All Actions To Be Completed By 10/15/91)
 - 1. A review will be conducted to determine how many record packages should have been generated by Quality and Implementing Procedures. Once a list is determined, a comparison will be made to those record packages contained in the records system. If packages are missing, the Records Source will be requested to obtain and transmit it to the LRC. If a complete records package can not be assembled, documentation will be issued and included in the package acknowledging the missing documentation. An evaluation of the affect on quality of the missing documentation will be performed and included as part of the records package. The above actions will be coordinated by the LRC.
 - 2. The completed 1990 Management Assessment was submitted to the LRC on 04/08/91.
 - 3. The Readiness Review for Midway Valley activities will be submitted to the LRC by 05/15/91.
 - 4. For those records that were submitted after the 10-day turnover requirement, no remedial actions can be taken.

CAR NO.	YM	-91-	037	
DATE:	04	-12-	91	
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CORRECTIVE ACTION REQUEST (continuation sheet)

CORRECTIVE ACTION RESPONSE: CAR YM-91-037 (Continued)

1. CORRECTIVE ACTION FOR DEFICIENT CONDITION # ALL

- D. <u>Corrective Action to Prevent Recurrence:</u> (Actions To Be Completed By 05/31/91)
 - 1. QPs 5.1 and 5.3 will be revised to distribute Quality and Implementing Procedures to the LRC as part of the mandatory review. This will ensure that the LRC is aware of what records or record packages will be generated by that procedure. The revisions will be completed by 05/31/91.
 - 2. Notification will be made to all YMP support departments identifying the records management deficiencies observed during the DOE audit of the REECo Yucca Mountain Project. Managers will be cautioned to notify their Record Sources and Administrators of the importance of record generation and submittal of completed records/record packages within the 10-day turnover timeframe. This notification will be completed by 05/31/91.
 - 3. Additional support and direction is being provided by the LRC Staff to Records Sources and Administrators through on-site visits, on-the-job training, menu-driven submittal programs and appropriate user's manuals. This is an on-going activity.

Response Approved:	Bruce Hudelle For R.F.P. Responsible Manager	<u>4/12/91</u> Date
ACCEPT RESPONSE: ACCEPT RESPONSE:	QAR OQA	Date
This response	was amended on AP 23,91	PD 4/24/21

Original

OFFICE OF CIVILIAN RADIOACTIVE WASTE MANAGEMENT U.S. DEPARTMENT OF ENERGY WASHINGTON, D.C.

CAR NO.	YM-91-037
_	04-23-91
SHEET.	1 OF 3

CORRECTIVE ACTION REQUEST (continuation sheet)

AMENDED RESPONSE

CORRECTIVE ACTION RESPONSE: CAR YM-91-037

1. CORRECTIVE ACTION FOR DEFICIENT CONDITION # ALL_

- A. Extent of Deficiency:
 - A sample review of record packages was performed and determined that many record packages may be missing from the Local Record Center (LRC).
 - For those record packages currently in the LRC, many were not submitted in accordance with the 10-day turnover requirement.
- B. <u>Root Cause:</u>

- C. <u>Remedial Actions:</u> (All Actions To Be Completed By 10/15/91)
 - 1. A review will be conducted to determine how many record packages should have been generated by Quality and Implementing Procedures. This review will be conducted by May 30, 1991 and will identify those packages (current revision level) which represent current activities.
 - 2. Once a list of packages has been determined, a comparison will be made to those record packages contained in the records system. This review will be conducted by 6/15/91.
 - 3. If packages for current activities are found missing, the Records source will be requested by 7/1/91 to obtain and transmit the required records to the LRC. If a complete records package can not be assembled, documentation will be issued and included in the package acknowledging the missing documentation. An evaluation of the affect on quality of the missing documentation will be performed and included as part of the records package. All activities associated with current activity packages will be completed by 8/1/91.

Str dtd 4/23/91- 580-01-377

CAR NO.	YM-9	1-037
DATE:	04-2	3-91
SHEET:	2OF	3

CORRECTIVE ACTION REQUEST (continuation sheet)

AMENDED RESPONSE

CORRECTIVE ACTION RESPONSE: CAR YM-91-037 (Continued)

1. CORRECTIVE ACTION FOR DEFICIENT CONDITION # ALL

- C. <u>Remedial Actions:</u> (Continued)
 - For all other missing packages (not current activity), the Records 4. Source will be requested by 8/1/91 to obtain and transmit the required records to the LRC if the missing information represents package data for an activity which will not be repeated or for procedures which will be used in the future. If a complete records package can not be assembled, documentation will be issued acknowledging the missing included the package and in An evaluation of the affect on quality of the documentation. missing documentation will be performed and included as part of the records package. All activities associated with current activity packages will be completed by 10/15/91
 - 5. The completed 1990 Management Assessment was submitted to the LRC on 04/08/91.
 - 6. The Readiness Review for Midway Valley activities will be submitted to the LRC by 05/15/91.
 - 7. For those records that were submitted after the 10-day turnover requirement, no remedial actions can be taken.
- D. <u>Corrective Action to Prevent Recurrence:</u> (Actions To Be Completed By 05/31/91)
 - 1. QPs 5.1 and 5.3 will be revised to distribute Quality and Implementing Procedures to the LRC as part of the mandatory review. This will ensure that the LRC is aware of what records or record packages will be generated by that procedure. The revisions will be completed by 05/31/91.

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		(continuation	n sheet)	
		AMENDED RE	SPONSE	
CORRECTIVE	ACTION RESPONS	<u>SE:</u> CAR YM-91-037	7 (Continued)	
1. CORRECTI	VE ACTION FOR	DEFICIENT CONDIT	FION # <u>ALL</u>	
D. <u>Corre</u>	ctive Action 1	to Prevent_Recurr	rence: (Continued)	
2.	identifying the DOE audi be cautioned the importan records/reco	the records mana t of the REECo Yu to notify their nce of record ge rd packages wit	agement deficienci ucca Mountain Proje Record Sources and neration and subm	apport departments es observed during ect. Managers will Administrators of ittal of completed urnover timeframe. 1.
3.	Staff to Revisits, on-t	ecords Sources he-job training,	and Administrator	ovided by the LRC s through on-site ittal programs and ng activity.
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Response	Approved:		sible Manager	<u> </u>
RESPONSE	ACCEPTED:	fais for		4-24-91
RESPONSE	ACCEPTED:	CHELONING Them	ptor for-	Date <u></u> Date
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Ŷ .		RADIOACTIVE V U.S. DEPART	E OF CIVILIAN WASTE MANAGEM IMENT OF ENERGY INGTON, D.C.	ENT 14CAR NO.: <u>YM7-91-038</u> DATE: <u>3/7/91</u> SHEFT: 1 OF 2
		CORRECTIVE	ACTION REQUES	T
	1 Controlling Document QP 17.0	- <u></u>		2 Related Report No. Audit 91-02
	3 Responsible Organization		4 Discussed With	
	REECo 10 Response Due	11 Responsibility for C	C. Thompson/R. Pric	12 Stop Work Order Y or N
	30 days after issue	R.F. Pritchett		N NOR CIGET TOTAL
	Management procedure." IM-LRC-IP-01, Revision 0 the LRC, records shall b or enclosures are includ QAPP, Revision 8, Section include (1) individual d furnish evidence of the. to demonstrate implement 6 Adverse Condition: Documents maintained as by the implementation of 1. Management Assessment are missing (Referenc 2. QP, IP, QS, Calibrati	, Paragraph 6.1.1.12 e reviewed to ensure ed." n XVII, Paragraph 1. ocuments that have b activities affecti ation of quality ass records are incomple the applicable proc for year 1990: Com e QP 2.3, Revision 1 on, and Welding proc and Quality Procedur	e and 6.1.1.12.1 state, the record is complet 1 states in part, "Qua ween executed, complete ing quality; (2) docume murance programs. A co- ete and do not contain redures. Examples are: mpleted checklists and , Paragraph 7.1) redures: Document Revi	ed as records shall be REECo/YMP approved Records "Prior to transmittal to e and all of its attachments lity Assurance Records d, and approved and that nts prepared and maintained mpleted record is a (Con't) all of the records generated Corrective Action Requests ew Record, Document Review issing (Reference QP 5.1,
	Identify the remedial ac	process, activities	or documentation to de	ncies noted in Block 6. termine the extent and depth
	8 Initiator Dat Marfo R. Diaz 2/28/91 Clio Joy 15 Verification of Corrective Action	1 2 2 3 1		Date: Strugtup <u>3-11-91</u>
	16 Corrective Action Completed		17 Closure Approve	d By:
		D-t-		
	QAR	Date	OQA	

	3/12/41
CAR NO .:	YNF-91-038
DATE:	3/7/91
SHEET	2OF_2

CORRECTIVE ACTION REQUEST (continuation sheet)

5 Requirements (continued)

document that will either receive no more entries or whose revision would normally consist of the reissue of the document; and is signed and dated by the originator and, as applicable, by personnel authorized to approve the document."

QP 2.3, Revision 1, paragraph 7.1 states, "The completed Management Assessment Report, Checklist, Memorandum, and Corrective Action Requests shall be considered QA Records, and shall be maintained in accordance with QP 17.0."

QP 5.1, Revision 2, paragraph 7.1 states, "Procedures and their revisions, Document Review Record, Document Review Record Continuation Sheets, and the Quality Procedure Change Notices, when applicable, generated by the implementation of this procedure are QA Records and shall be packaged together and processed in accordance with QP 17.0.

7 Recommended Action(s) (continued)

Identify these deficiencies and provide the measures required to correct them. Identify the cause of the condition and the planned corrective action to prevent recurrence.

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CAR NO	YM-91-038
DATE:	04-12-91
SHEET.	1 OF 2

CORRECTIVE ACTION REQUEST (continuation sheet)

CORRECTIVE ACTION RESPONSE: CAR YM-91-038

1. CORRECTIVE ACTION FOR DEFICIENT CONDITION # ALL_

A. Extent of Deficiency:

Based on a sample review, it appears that many of the record packages submitted may be deficient in their required documentation.

B. <u>Root Cause:</u>

- C. <u>Remedial Actions:</u> (All Actions To Be Completed By 10/15/91)
 - 1. The submitted Record Packages will be examined by the Record Source and Local Records Center (LRC) Staff to determine what documents, as required by the governing procedure, were included in the packages. If documentation is missing, the Records Source will attempt to obtain and include it in the package. Otherwise documentation will be issued and included in the package acknowledging the missing documentation. An evaluation of the affect on quality of the missing documentation will be performed and included as part of the records package.
 - 2. The completed 1990 Management Assessment was submitted to the LRC on 04/08/91.
- D. <u>Corrective Action to Prevent Recurrence:</u> (Actions To Be Completed By 05/31/91)
 - 1. QPs 5.1 and 5.3 will be revised to distribute procedures to the LRC as part of the mandatory review. This will ensure that the LRC is aware of what records or record packages will be generated by that procedure. These revisions will be completed by 05/31/91.

CAR NO.<u>YM-91-038</u> DATE: <u>04-12-91</u> SHEET: <u>2</u> of <u>2</u>

OFFICE OF CIVILIAN RADIOACTIVE WASTE MANAGEMENT U.S. DEPARTMENT OF ENERGY WASHINGTON, D.C.

CORRECTIVE ACTION REQUEST (continuation sheet)

CORRECTIVE ACTION RESPONSE: CAR YM-91-038 (Continued)

1. CORRECTIVE ACTION FOR DEFICIENT CONDITION # <u>ALL</u> (Continued)

D. <u>Corrective Action to Prevent Recurrence:</u> (Continued)

- 2. Notification will be made to all YMP support departments identifying the records management deficiencies observed during the DOE audit of the REECo Yucca Mountain Project. Managers will be cautioned to notify their Record Sources and Administrators of the importance of record generation and submittal of completed records/record packages within the 10-day turnover timeframe. This notification will be completed by 05/31/91.
- 3. Additional support and direction is being provided by the LRC Staff to Records Sources and Administrators through on-site visits, on-the-job training, menu-driven submittal programs and appropriate user's manuals. This is an on-going activity.

Response Approved: Brune Handelk For RFP Responsible Manager	<u>4/12/91</u> Date
RESPONSE ACCEPTED:QAR	Date
RESPONSE ACCEPTED:OQA	Date
* This response was amended on APZ	3,91 (HDy/24/91

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CAR NO	YM-91-038
DATE:	04-23-91
SHEET:	1 of 2

CORRECTIVE ACTION REQUEST (continuation sheet)

AMENDED RESPONSE

CORRECTIVE ACTION RESPONSE: CAR YM-91-038

1. CORRECTIVE ACTION FOR DEFICIENT CONDITION # <u>ALL</u>

A. Extent of Deficiency:

Based on a sample review, it appears that many of the record packages submitted may be deficient in their required documentation.

B. <u>Root Cause:</u>

- C. <u>Remedial Actions:</u> (All Actions To Be Completed By 10/15/91)
 - 1. Using the list of packages generated as part of the remedial actions for CAR-YM-91-037, item C 1, those packages which represent current activities which are currently in the LRC will be reviewed by Quality Assurance and the LRC staff to determine the completeness of the records submitted in accordance with the governing procedure. This review will be completed by 6/15/91.
 - 2. If documentation is found missing for current activities, Quality Assurance will conduct an evaluation of the affect on quality of the missing documentation and included as part of the package by 7/1/91.
 - 3. If the missing documentation is deemed to be critical to the satisfactory performance of quality affecting activities for the licensing of the repository, then the Records source will be requested to provide the missing information to the LRC no later than 8/1/91.
 - 4. For all other packages which are not representative of current activities, the review for package completeness and affect on quality determination for missing documentation will be completed by 10/15/91.
 - 5. The completed 1990 Management Assessment was submitted to the LRC on 04/08/91.

Str dts 4/23/91 - 580-01-377

е 1.	OFFICE OF CIVILIAN RADIOACTIVE WASTE MANAGEMENT U.S. DEPARTMENT OF ENERGY WASHINGTON, D.C. CORRECTIVE ACTION REQUEST	CAR NO. YM-91-038 DATE: 04-23-91 SHEET: 2_OF 2
	(continuation sheet)	
AMENDED RESPONSE		
CORRECTIVE ACTION RESPONSE: CAR YM-91-038 (Continued)		
1. CORRECTIVE ACTION FOR DEFICIENT CONDITION # <u>ALL</u> (Continued)		
D. <u>Corrective Action to Prevent Recurrence</u> : (Actions To Be Completed By 05/31/91)		
1.	QPs 5.1 and 5.3 will be revised to distribute procedures to the LRC as part of the mandatory review. This will ensure that the LRC is aware of what records or record packages will be generated by that procedure. These revisions will be completed by 05/31/91.	
2.	Notification will be made to all YMP support departments identifying the records management deficiencies observed during the DOE audit of the REECo Yucca Mountain Project. Managers will be cautioned to notify their Record Sources and Administrators of the importance of record generation and submittal of completed records/record packages within the 10-day turnover timeframe. This notification will be completed by 05/31/91.	
3.	Additional support and direction is being provided by the LRC Staff to Records Sources and Administrators through on-site visits, on-the-job training, menu-driven submittal programs and appropriate user's manuals. This is an on-going activity.	
Response Approved: 127 Price 4/23/91 Responsible Manager Date		
RESPONSE ACCEPTED: <u>flais de </u> <u>4/24/9</u> Date <u>Date</u>		
RESPONSE ACCEPTED: Cothonine & compton for 4-210-91 OQA Date		

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